



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 2, 2015

DOUGLAS A. DOUGHERTY, TREASURER
FRIENDS OF DICK DURBIN
PO BOX 1949
SPRINGFIELD, IL 62705

Response Due Date
05/07/2015

IDENTIFICATION NUMBER: C00148999

REFERENCE: 30 DAY POST-GENERAL REPORT (10/16/2014 - 11/24/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Senate Public Records Office by the response date noted above. Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 6 item(s):

1. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$2,600 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f) (formerly 2 U.S.C. § 441a(a) and (f)); 11 CFR § 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

Excessive contributions may be retained if, within 60 days of receipt, the

FRIENDS OF DICK DURBIN

Page 2 of 7

excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below.

For reattributions, excessive contributions from individuals can be retained if, within 60 days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(1).

FRIENDS OF DICK DURBIN

Page 3 of 7

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 20(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund, redesignate, and/or reattribute the excessive amount will be taken into consideration.

2. Schedule A (see attached) discloses a contribution(s) from an individual(s) who has a mailing address outside of the United States of America. Please be advised that 52 U.S.C. § 30121(a) (formerly 2 U.S.C. §441e(a)) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If your committee follows the safe harbor guidelines outlined under 11 CFR §110.20(a)(7) for all contributions received from a foreign address to ensure that the sources of these contributions are not foreign nationals, please provide a detailed description of your procedures. These procedures must be used in all cases where a contributor or donor uses a foreign passport or passport number for identification purposes, provides a foreign address, makes a contribution or donation by means of a check or other written instrument drawn on a foreign bank or by wire transfer from a foreign bank, or resides abroad. A committee is deemed to have conducted a reasonable inquiry into the contributor or donor's nationality if you seek and obtain copies of current and valid U.S. passport papers for U.S. citizens. No person may rely on this safe harbor if he or she has actual knowledge that the source of the funds solicited, accepted, or received is a foreign national.

If you have received a contribution from a foreign national, you must refund

FRIENDS OF DICK DURBIN

Page 4 of 7

the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, any refunds should be disclosed on Schedule B supporting Line 20(a) of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution(s), prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

3. Schedule B of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). The Act precludes an authorized or principal campaign committee from making a contribution to a candidate for federal office in excess of \$2,000 per election. (11 CFR §§ 102.12(c) and 102.13(c)) If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If the contribution made was excessive, you must notify the recipient committee and either request a refund or redesignate (if applicable) the amount in excess of \$2,000.

If requesting a refund, you also must inform the Commission in writing of such a refund and provide a photocopy of any refund request sent to the recipient committee. The refund must appear on Line 15 of the Detailed Summary Page and on a supporting Schedule A of the report covering the period in which the refund is received.

In regard to redesignations, you can authorize the recipient committee to redesignate the excessive portion of the contribution to another election provided the new designation does not exceed the limitations on contributions made with respect to that particular election. Also, the redesignation must be done within 60 days of the contribution being received by the recipient committee. A contribution can only be redesignated to a previous election provided the recipient committee has net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i)) If the above conditions for redesignations are not met within 60 days of receipt, the excessive amount must be refunded to your committee. See 11 CFR § 103.3(b)(3).

FRIENDS OF DICK DURBIN

Page 5 of 7

Although the Commission may take further legal action concerning the excessive contribution(s), your prompt action to either redesignate or obtain a refund of the excessive amount will be taken into consideration.

4. Schedule A of your report discloses one or more contributions received after the 2014 general election that are designated for the 2014 general. These contributions may only be accepted to the extent that the committee has net debts outstanding from the 2014 general election. For more information on how to calculate net debts outstanding, please see page 27 of the Campaign Guide for Congressional Candidates and Committees, which is available online at <http://www.fec.gov/pdf/candgui.pdf>. (11 CFR § 110.1(b)(3)(i))

A contribution is considered made when the contributor relinquishes control over the contribution. A contributor shall be considered to have relinquished control over the contribution when it is delivered to the candidate, when it is delivered to an authorized committee of the candidate, or to an agent of an authorized committee of the candidate. A contribution that is mailed to any of the aforementioned recipients will be considered made on the date of the postmark. Envelopes should be retained for the committee's records. (11 CFR § 110.1(b)(6))

If any contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If a contribution exceeds the amount of net debts outstanding from the 2014 general election, you may have to refund or redesignate the contribution.

The funds can be retained if, within 60 days of receipt, the excessive amount was properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election, or (2) the committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B))

FRIENDS OF DICK DURBIN

Page 6 of 7

If the foregoing conditions for redesignations are not met within 60 days of receipt, the excessive amount must be refunded. See 11 CFR § 103.3(b)(3).

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/or letters redesignating the contributions in question. Refunds are reported on Line 20(a), (b) or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund or redesignate the excessive amount will be taken into consideration.

5. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-General Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information.

6. It appears that your committee may have filed duplicate 48-hour notices. Your committee filed two 48-hour notices for each of the attached contributions; however, these contributions are only disclosed once on Schedule A of your report. Please amend your report to include the additional contributions or provide an explanation of the apparent discrepancies. (11 CFR §104.3(a)(4)(i))

- Please be advised that the FEC Committee ID numbers for the following contributions from political committees appear to be incorrect: PLANNED

FRIENDS OF DICK DURBIN

Page 7 of 7

PARENTHOOD ACTION FUND INC PAC (C70004148) and BUILD PAC (C70002712). Use of incorrect FEC Committee ID numbers may create difficulty in identifying the contributing committee for the public record. (11 CFR § 104.3(a)(4))

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

A written response or an amendment to your original report(s) correcting the above problems should be filed with the Senate Public Records Office. Please contact the Senate Public Records Office at (202) 224-0322 for instructions on how and where to file an amendment. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1155.

Sincerely,

A handwritten signature in black ink that reads "Vicki S Davis". The signature is written in a cursive, flowing style.

Vicki Davis
Senior Campaign Finance Analyst
Reports Analysis Division

Image# 15330079781

**Excessive, Prohibited, and Impermissible Contributions
Friends of Dick Durbin (C00148999)**

Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
GIAMANCO, SCHERRIE	3/15/13	\$1,200.00	G, 2014
GIAMANCO, SCHERRIE	8/29/13	\$100.00	G, 2014
GIAMANCO, SCHERRIE	9/6/13	\$150.00	G, 2014
GIAMANCO, SCHERRIE	10/1/13	\$20.00	G, 2014
GIAMANCO, SCHERRIE	11/10/13	\$25.00	G, 2014
GIAMANCO, SCHERRIE	11/30/13	\$25.00	G, 2014
GIAMANCO, SCHERRIE	12/6/13	\$25.00	G, 2014
GIAMANCO, SCHERRIE	12/27/13	\$100.00	G, 2014
GIAMANCO, SCHERRIE	3/22/14	\$500.00	G, 2014
GIAMANCO, SCHERRIE	10/13/14	\$455.00	G, 2014
GIAMANCO, SCHERRIE	10/27/14	\$8.33	G, 2014
LINDBERG, ASTRI	7/9/13	\$500.00	G, 2014
LINDBERG, ASTRI	9/27/13	\$350.00	G, 2014
LINDBERG, ASTRI	10/20/13	\$500.00	G, 2014
LINDBERG, ASTRI	11/19/13	\$250.00	G, 2014
LINDBERG, ASTRI	12/30/13	\$500.00	G, 2014
LINDBERG, ASTRI	3/25/14	\$500.00	G, 2014
LINDBERG, ASTRI	3/31/14	\$125.00	G, 2014
LINDBERG, ASTRI	4/24/14	-\$125.00	G, 2014
LINDBERG, ASTRI	10/27/14	\$16.66	G, 2014
PORT, RONALD B	12/31/13	\$500.00	G, 2014
PORT, RONALD B	3/31/14	\$1,000.00	G, 2014
PORT, RONALD B	9/8/14	\$1,000.00	G, 2014
PORT, RONALD B	10/16/14	\$1,000.00	G, 2014

Excessive Contributions from Committees

Contributor Name	Date	Amount	Election
HUNTINGTON INGALLS INDUSTRIES, INC. PAC	3/30/13	\$1,000.00	G, 2014
HUNTINGTON INGALLS INDUSTRIES, INC. PAC	9/30/13	\$2,000.00	G, 2014
HUNTINGTON INGALLS INDUSTRIES, INC. PAC	3/31/14	\$1,000.00	G, 2014
HUNTINGTON INGALLS INDUSTRIES, INC. PAC	6/30/14	\$1,000.00	G, 2014
HUNTINGTON INGALLS INDUSTRIES, INC. PAC	10/22/14	\$1,000.00	G, 2014

Contributions from Individuals with Foreign Addresses

Contributor Name	Date	Amount	Election
HILL, HARRY	11/1/14	\$2,600.00	G, 2014

Image# 15330079782

**Excessive, Prohibited, and Impermissible Contributions
Friends of Dick Durbin (C00148999)**

Excessive Contributions to Other Committees

Recipient Name	Date	Amount	Election
FRIENDS OF MARY LANDRIEU INC	11/24/14	\$45,000.00	O, 2014 RUNOFF

Image# 15330079783

Missing 48-Hour Notices
Friends of Dick Durbin (C00148999)

Contributor Name	Date	Amount	Election
FRIEDMAN, LINDA	10/31/14	\$1,000.00	G, 2014
TEGELER, JEFFREY	10/31/14	\$1,000.00	G, 2014
AMERICAN ACADEMY OF SLEEP MEDICINE P	11/1/14	\$1,000.00	G, 2014
AMERICAN COLLEGE OF RHEUMATOLOGY (F	11/1/14	\$1,500.00	G, 2014
BROWN RUDNICK FEDERAL PAC	11/1/14	\$2,500.00	G, 2014
CARPENTERS LEGISLATIVE IMPROVEMENT C	11/1/14	\$5,000.00	G, 2014
CELANESE CORPORATION POLITICAL ACTIO	11/1/14	\$5,000.00	G, 2014
DAYLAN, HAYGANUSH	11/1/14	\$1,000.00	G, 2014
ENVIRONMENT AMERICA VOTER ACTION	11/1/14	\$1,000.00	G, 2014
ESAYIAN, LISA	11/1/14	\$2,600.00	G, 2014
HILL, HARRY	11/1/14	\$2,600.00	G, 2014
KOROGLUYAN, OHANNES	11/1/14	\$1,000.00	G, 2014
KOVACH, GINA	11/1/14	\$1,000.00	G, 2014
MCGUIREWOODS FEDERAL PAC	11/1/14	\$1,000.00	G, 2014
MICROSOFT CORPORATION POLITICAL ACTIO	11/1/14	\$2,000.00	G, 2014
MINASIAN, ARMEN	11/1/14	\$1,000.00	G, 2014
MONDERO, DENNIS	11/1/14	\$2,350.00	G, 2014
TATOSIAN, OSCAR	11/1/14	\$1,000.00	G, 2014
THOMPSON COBURN POLITICAL ACTION COM	11/1/14	\$3,500.00	G, 2014
TTX COMPANY PAC	11/1/14	\$2,600.00	G, 2014

Image# 15330079784

**Incorrectly Reported Receipts on 48-Hour Notices
Friends of Dick Durbin (C00148999)****Apparent Duplicate 48 Hour Notices Filed**

Contributor Name	Date	Amount
FRIEDMAN, PHILIP	10/16/14	\$1,000.00
GRIFFIN, JOHN JR	10/30/14	\$1,000.00
LEHMAN, FRANCES	10/16/14	\$1,000.00
LYONS, KEVIN W	10/30/14	\$1,500.00
MANDONADO, JOSE	10/30/14	\$2,500.00
MUSER, ILLYSE	10/16/14	\$2,000.00
OBIN, ANDREW	10/16/14	\$2,500.00
SUAREZ, SERGIO	10/30/14	\$1,350.00